

## DOT Docket Office

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FAA-01-11133-51

From: mastercfi@yahoo.com  
Sent: Tuesday, February 12, 2002 6:35 AM  
To: govt@eaa.org  
Subject: Comments to NPRM No. FAA-2001-11133, Certification of Pilots, Aircraft and Repairmen for the Operation of Light Sport Aircraft

156080

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I would like the following aircraft to be eligible for the Light Sport Aircraft category:

Aircraft/kit Manufacturer: Aeronca  
Type of Aircraft: Airplane  
Aircraft Model: 7CCM / S7CCM  
Number of Engines: one  
Type of Engine: recip  
Type of Propeller: fixed  
Number of Seats: 2  
Fixed Gear: Yes  
Seaplane with Repositionable Gear: No  
Maximum Gross Weight: 1300 lbs.  
Maximum Stall Speed, Landing Configuration: 37 mph  
Life-enhancement devices: No  
Maximum Stall Speed, Cruise: 37 mph  
Maximum Cruise Speed: 100 Cruise (135 VNE) mph

Justification: This aircraft is almost identical to the Aeronca 7AC which qualifies as a sport airplane. The only difference is that the tail is slightly enlarged by adding a structural member, the engine is change from a 65 HP Continental to a 90 HP Continentalm there is a structural bar added in the nose to compenstate foe the heavier engine. There is also an added 5.5 gal wing tank in addition to the standard nose tank to compensate for the larger engines greater fuel consumption. All other systems are identical. The 90 HP has a higher allowable engine RPM than does the 65 HP and the VNE was increased from 129 MPH to 135 MPH. The 7CCM was created for the military just after WWII and designated as the L-16B and used as a liason aircraft. It is simply a Champ with a slightly larger engine. It is an antique classic type aircraft. The 7AC Champ has a MGW of 1220 where the 7CCM is 1300. This is 68 lbs greater than the NPRM of 1232. Additionally I believe that consideration MUST be made for all similar aircraft and especially for these ageless classics on floats. If the above 7CCM is put on floats the MGW is increased to 1400 lbs. The VNE speed is decreased to 129 MPH and the stall drops in landing configuration to about 34 MPH. This is 168 lbs above the MGW allowed in the NPRM.

I feel that all of the antique classic models like the Champ, Chief, Cub, Taylorcraft and similar aircraft should specifically be looked at and approved with up to standard engines including the 65 HP through the 90 HP configurations and that the increase MGW while on floats should also be included. NONE of the classic aircraft mentioned are included in the NPRM when on floats because they all exceed the MGW in that configuration. Special attention needs to be concentrated on these particular aircraft.